



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

December 17, 2012

Rick Brazell  
Forest Supervisor  
Clearwater National Forest  
12730 Highway 21  
Orofino, Idaho 83844

Re: U.S. Environmental Protection Agency comments for the Lower Orogrande Revised Draft Environmental Impact Statement (RDEIS). EPA Project Number: 10-001-AFS.

Dear Mr. Brazell:

The EPA has reviewed the RDEIS for the Lower Orogrande Project on the Clearwater National Forest. This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement.

The Lower Orogrande project includes watershed improvements, timber harvest, and wildlife enhancement activities on 21,250 acres on the Clearwater National Forest. The RDEIS was developed to address comments raised on the previous analysis in the 2011 final EIS. The substantive changes identified in the RDEIS include a discussion of management indicator species, additional information of adjacent lands, and an update to the effects section for soils based on revised unit boundaries. Other changes in the RDEIS are modified proposed road activities due to further review of the Roads Analysis and 30 fewer acres proposed for silviculture treatments.

The RDEIS evaluates two action alternatives (Alternatives 2 and 3) that propose decommissioning 89 miles of road, replacing 16 undersized culverts, installing 3 additional fish passage culverts, and year round road restrictions on 14.5 miles to improve elk security. Alternative 2 is identified as the agency's Preferred Alternative and differs by including 2.4 miles of temporary road construction, 60 additional acres of regeneration harvest (660 total acres) and 70 more acres of commercial thinning (500 total acres).

The EPA provided comments on the previous draft and final EISs in 2011. In our comments on the final EIS we stated that our concerns regarding water quality, monitoring, and habitat were resolved based on clarification in the final EIS and further conversations with Forest Service staff. However, we encouraged the Forest Service to consider results from long term monitoring efforts and utilize adaptive management as a means to adjust activities and priorities when necessary to promote an upward trend in watershed conditions. We acknowledge the improvements made to the current analysis and for continuing to promote resilient watershed conditions on the Lower Orogrande through road decommissioning efforts, habitat improvements, and by prioritizing fish passage needs. Based on our

review we have rated the revised draft EIS LO (Lack of Objections). An explanation of this rating is enclosed.

While the EPA supports these efforts, we continue to encourage the Forest Service to develop a detailed monitoring plan that includes a discussion of how monitoring results would inform the implementation of forest activities and the potential need to modify these in order to further the project's goals. We also understand that the Clearwater/Nez Perce Forest Plan is currently being revised through the collaborative forest process. We recommend that the Forest Service consider issues identified through this process that may pertain to the project area directly or cumulatively. This may provide useful information to help manage limited resources and strategically target key resources to promote a dynamic forest with healthy aquatic habitats.

We appreciate the opportunity to provide comments on the RDEIS. If you have any questions or concerns regarding the comments, please contact me at (206) 553-1601 or by email at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Lynne McWhorter of my staff at (208) 378-5757 or by email at [mcwhorter.lynne@epa.gov](mailto:mcwhorter.lynne@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.